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116	D.1.4.5.1	OSS-1 ATLAS - TM/Region (seconds)	PINS - ATLAS - TN + 2 Sec	2.96	606,511	1.70	7,198			2.21	9,707			1.73	10.074		349,603				38,477	1,23	3,321
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		K reur Rereugh Service Requests C-3 Summer/Region(%)																					
	F.1.1.1 F.1.1.2	C-3 SummaryRegion(%)	Diagnostic Diagnostic			88.82%	236,181 236,161	-		7.475	288,331				276,151 276,191			82.M%	245,000			88.82% 88.82%	273,0
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eo. 167, 127	F.1.2.3	% Flow Through Service Requests - LAP					1 14.107				50,500			80.818	94,719				1 00,100			62.50 X	30,71
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83																							
83		Vasge Date Dalivery Timeliness	_																				
83 13	F.9.2	Usage Date Delivery Tereliness D-5 Region(%) General - Cleange Management	Parity w Retail	97.37%	30,110	99.45%	239,187,848	98.80%	34,467	99.30%	254,987,840	90.95%	40,304	96 52%	220,452.42	97.30%	38,841	99.21%	193,986,433	57.46%	36,202	96.04%	187,964

I. Background:

The BellSouth Change Control Process ("CCP") document states that the CCP is designed to manage all change requests "that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service, including defect/expedite notification."

The Change Control Prioritization Process is the method used by CLECs and BellSouth to rank the importance of both CLEC- and BellSouth-initiated change requests. The Prioritization Process is outlined in the BellSouth CCP document². CCP participants meet monthly for discussion of such issues as the status of recently submitted change requests, prioritization (when the CLECs agree to do so) of change requests that have been accepted as candidates to be considered for implementation, and to address other process and operational questions related to change requests.

BellSouth also utilizes an Internal Prioritization Process in conjunction with the CCP. The Internal Prioritization Process is outlined in the BellSouth CCP document³ and includes – to confirm and ensure viabilities – a review of the rankings determined by the CLECs and BellSouth during the Prioritization Process described above.

Additional factors considered during the prioritization process are as follows:

- Mandated regulatory changes that are due during the release cycle are prioritized first.
- ii. Change Requests that have related features that are all required for implementation to complete a function are given a higher priority than standalone changes to ensure the most efficient use of resources.
- iii. Change Requests that are necessary for proper system operation and stability are given a high priority.

Key CLEC-driven changes such as Telephone Number ("TN") versus Address Validation and Parsed Customer Service Record ("CSR") are being addressed in 2001, for November 2001 and January 2002 implementation.

An explanation of how the capacity was allocated in 2001 follows.

II. BellSouth Software Capacity Year 2001 Utilization

Of the total Year 2001 software capacity (i.e., total hours to develop, test & implement system features), approximately 40% was utilized to address CLEC requests submitted as state/federal

¹ Page 16 of BellSouth's CCP document Version 2.6 (September 10, 2001), provided as Exhibit OSS-39 to William N. Stacy affidavit of October 2, 2001.

² Pages 33-34, 54, CCP document Version 2.6 (September 10, 2001)

³ Pages 34, 42, CCP document Version 2.6 (September 10, 2001)

mandate and via the CCP prioritization process. The CLEC-driven allocation resulted in approximately \$65,992,680 and 119,867 programming hours. The remaining 60% was spent (approximately) as follows: \$38,918,760 and 69,372 programming hours for maintenance and defects, \$10,152,720 and 18,289 programming hours for public switched network, and \$54,147,840 and 98,962 programming hours for BellSouth-initiated requests, which also benefit the CLECs. Due to significant demand from mandates and system operations, the majority of the capacity was used in these two areas with approximately twice the demand from mandates over system operations. In all cases, these software changes (i.e., features) directly benefited the CLECs.

A. State/Federal Mandates: In addition to the CCP, CLECs can submit requests through regulatory channels such as the state utilities commissions. Generally, these CLEC requests have a date-specific requirement, and address such issues as ordering requirements for new services, industry standards, parity with BellSouth's retail operations, reporting requirements, or required new inter-company processes – and usually beyond the ability to resolve within the CCP.

Following are some examples where CLECs were provided additional features/functionality as a result of CLEC-driven mandates:

- New Test Environment BellSouth created a test environment enabling CLECs to test new functionality. This test environment is referred to as CAVE (CLEC Application Verification Environment)⁴.
- CSR Parsing (in production January 5, 2002) Enables CLECs to further parse Customer Service Record information into separate fields.
- Line Splitting (in production January 5, 2002. Note: Line Sharing was implemented September 2000.) Enables a CLEC to offer voice and a DLEC to offer data on the same facility.
- Loop Make-up and XDSL Changes were implemented enabling CLECs to
 process LSRs for ADSL/HDSL- and Unbundled Copper Loop (UCL)capable loops. Changes were implemented that enables CLECs to select/reserve
 facilities as part of the Loop Make-up inquiry. Changes were implemented to the
 pre-ordering process to allow CLECs to view account records.
- Calculate Due Date In addition to providing the estimated due date, provides CLECs the ability to receive a calculated due date based upon the work force availability and the product/service interval.
- Electronic Flow-Through of Service Requests Multiple releases included features enabling CLECs to process additional types of service requests mechanically via LENS, TAG and/or EDI.
- TN Versus Address Validation Changes were implemented enabling a CLEC with the option of submitting a migration request using the telephone number to order rather than submitting a complete street address.
- Increased Time Interval Prior to Cancellation of a Local Service Request
 ("LSR") Allows CLECs 30 days before a clarified LSR is cancelled for no
 activity. This provides a CLEC a longer period of time to discuss any changes
 required by its customer.

⁴ Was CLECs' #1 CCP priority in 2000

- **B. Proper System Operation**: Infrastructure and maintenance changes to the wholesale operating systems and interfaces (i.e., LENS, TAG, EDI, LESOG and LNP) are changes that accomplish the following upgrades of operating system software:
 - Application software that improves stabilization, response time;
 - Installation of hardware that require the movement of applications or change to applications; or
 - Defect correction that includes changes made to software when the application is not working as requested or designed. A defect is any unintended operation that is not properly responsive to the originator's request, or an unintended operation caused by a flawed implementation of the original software change request.
- C. Ordering Processes: These features are changes that either a CLEC or BellSouth has identified as beneficial to improve the ordering process, and are prioritized by importance within the CCP process. Examples implemented include:
 - Business rule Local Service Request (LSR) field usage changes (Example: CR0133/CR0371 – Telephone Number versus Address Validation)
 - New functionality for an interface (Examples: CR0015 LENS Act of C Change basic class of service; CR0030 UNE-to-UNE migrations)
 - Change existing functionality for an interface (Examples: CR0091 Add Desired Frame Due Time to the Firm Order Confirmation; CR0149 – Modify and re-send FOCs and clarifications; CR0373 – Migrations as specified – LNA of G)
 - Electronic ordering of a product/service (Examples: CR0153 Line Sharing; CR0359 – Electronic ordering of xDSL loops; CR0361 – Mechanize service inquiry process for xDSL loops)

While a major portion of the software capacity expended in 2001 was focused on adherence to state/federal mandates listed above and ensuring proper system operation, a significant amount of work from other sources did progress through the CCP, and software changes were implemented.

A summary of CCP implemented activities follows.

April 2000 – November 2001

Total number of mandate requests:	13
 Public Switched Network 	5
 CLEC-initiated 	8
Total number of BST requests: 15 software changes	26
Total number of CLEC requests: 22 software changes	32
Total number of defect requests:	117

BST (59)

CLEC (58)

72 software changes

III. BellSouth Planning for 2002 Forward:

In an effort to address CLEC and KPMG Third-Party Test concerns in the CCP about release resource planning, BellSouth is making the following proposal: BellSouth will allocate 40% of its annual release capacity for implementing CLEC change requests and/or CLEC-driven mandates. This should provide the CLECs the ability to more readily rely upon the CCP as their first option for submitting a change request, thus obviating the need for CLECs to seek relief via regulatory channels. The remaining 60% will be used for implementing public switched network mandates such as NPA overlays and Number Pooling (5-10%), defects and maintenance (approximately 25%), and the remaining 25-30% for BellSouth change requests that also benefit the CLECs. This allocation strategy results in greater release capacity being devoted to CLEC-initiated requests (including CLEC-driven mandates such as TN validation) than to BellSouth-initiated requests. BellSouth will provide information to the requesting CLECs as to whether BellSouth believes the requested change will require a small, medium, or large amount of resource allocation. BellSouth will provide such a preliminary estimate for each change request submitted for prioritization. BellSouth will also track the capacity per the above categories and provide a year-to-date percent capacity used for CLEC-initiated requests. BellSouth will provide this report on a quarterly basis, beginning with calendar year 2002.

Further, of the top fifteen pending prioritized CCP feature requests, BellSouth has committed to implementing at least five of these during releases planned for the first half of 2002. This is in addition to BellSouth's commitment to deploy other mandates that have previously been communicated. Those features are related to:

- Line Splitting
- Parsed CSR
- Enhancement of Service Inquiry for SL1, SL2 and DSO
- Pre-ordering for DS1 and ISDN
- Single "C" Ordering.



(ORDERING AND PROVISIONING) New Product Announcement – SWBT IDSL Capable Loop – Arkansas, Kansas, Missouri, Oklahoma, and Texas

Date: March 5, 2001

Number: CLEC01-046

Contact: Southwestern Bell Account Manager

Category: UNE

This Accessible letter replaces **CLEC01-043**, dated March 2, 2001 announcing the availability of the ISDN Digital Subscriber Line (IDSL) Capable Loop effective March 12, 2001 in the SWBT region. The IDSL-Capable Loop is a 2-wire digital loop facility that supports IDSL services. The loop will be provisioned to pass end user data rates up to 144 KBPS bonded signal.

The 2-wire IDSL-capable loop will have associated recurring and non-recurring charges that will be billed according to the rates and terms contained in each CLEC's interconnection agreement. Acceptance testing is part of the standard provisioning process for the IDSL-capable loop and the cost for this procedure will be included in the loop costs. Contract language is currently available to amend your interconnection agreement.

The due date interval for IDSL implementation will be according to the terms contained in each CLEC's interconnection agreement.

For CLECs with terms for IDSL Capable Loops, please use the following information for ordering IDSL Capable Loops:

SPEC Code:

UNBLTA

• Service Code:

AGXU

NC:

ADPA

NCI:

02QC5.OOS

SECNCI:

02IS5

A cross connect element must be purchased by the CLEC to connect the IDSL Capable Loop to the CLEC's collocation arrangement. The cross connect currently used with the two-wire digital loop will be utilized for IDSL Loops.

Please refer any questions to your Southwestern Bell Account Manager.



(ORDERING AND PROVISIONING) New Product Announcement - SWBT IDSL Capable Loop - Arkansas, Kansas, Missouri, Oklahoma, Texas

Date: May 3, 2001

Number: CLEC01-106

Contact: Southwestern Bell Account Manager

Category: UNE

This Accessible letter corrects **CLEC01-046**, dated March 5, 2001 announcing the availability of the ISDN Digital Subscriber Line (IDSL) Capable Loop effective March 12, 2001 in the SWBT region. The IDSL-Capable Loop is a 2-wire digital loop facility that supports IDSL services. The loop will be provisioned to pass end user data rates up to 144 KBPS bonded signal.

For CLECs with terms for IDSL Capable Loops, please use the following information for ordering IDSL Capable Loops:

SPEC Code: UNBLNT

The rest of the information as provided on CLEC01-046 will remain the same.

Please refer any questions to your Southwestern Bell Account Manager.

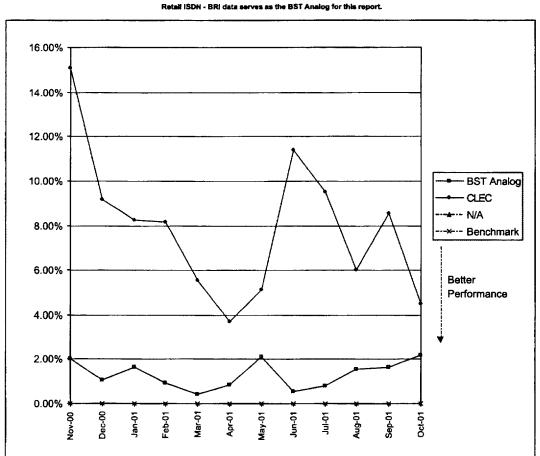
Unbundled Network Elements - Provisioning % Provisioning Troubles within 30 Days

UNE ISDN/<10 circuits/Dispatch/GA (%)

(% of Trouble Reports Received within 30 Days of Service Order Completion)

Numerator indicates total number of initial trouble reports received within 30 days of service order completion for this disaggregation in the previous reporting period.

Volume indicates total number of service orders completed for this disaggregation in the previous reporting period.



	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01
BST Analog	2.03%	1.05%	1.65%	0.94%	0.42%	0.85%	2.11%	0.56%	0.79%	1.57%	1.66%	2.20%
Numerator	17	7	9	7	3	6	13	3	4	7	8	9
Volume	837	669	546	742	720	704	615	532	505	447	483	410
CLEC	15.09%	9.17%	8.24%	8.15%	5.56%	3.68%	5.11%	11.36%	9.48%	6.00%	8.50%	4.48%
Numerator	128	74	51	56	32	23	36	40	38	15	29	10
Volume	848	807	619	687	576	625	704	352	401	250	341	223
StDev												
StError	0.00687	0.00533	0.00748	0.00511	0.00362	0.00505	0.00793	0.00514	0.00593	0.00981	0.00903	0.01219
ZScore	-19.0068	-15.2356	-8.8112	-14.1119	-14.2176	-5.6091	-3.7819	-20.9912	-14.6463	-4.5221	-7.5860	-1.8776
Equity	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO

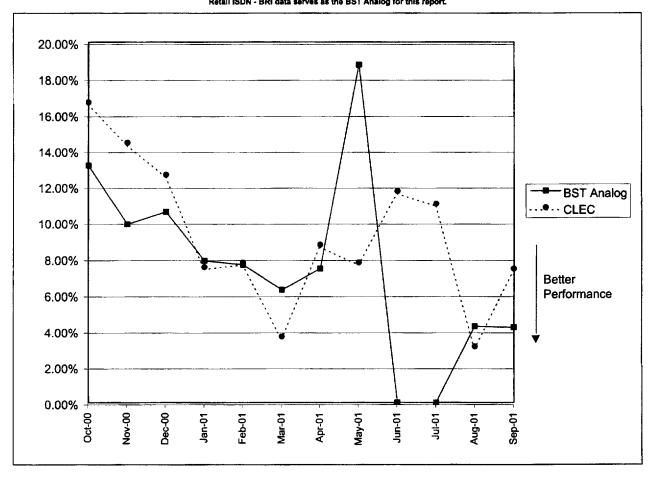
Unbundled Network Elements - Provisioning % Provisioning Troubles within 30 Days UNE ISDN/<10 circuits/Dispatch/LA (%)

(% of Trouble Reports Received within 30 Days of Service Order Completion)

Numerator indicates total number of initial trouble reports received within 30 days of service order completion for this disaggregation in the previous reporting period.

Volume indicates total number of service orders completed for this disaggregation in the previous reporting period.

Retail ISDN - BRI data serves as the BST Analog for this report.



	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01
BST Analog	13.16%	9.87%	10.56%	7.86%	7.63%	6.25%	7.41%	18.75%	0.00%	0.00%	4.26%	4.20%
Numerator	25	15	15	11	10	9	10	24	0	0	6	6
Volume	190	152	142	140	131	144	135	128	295	166	141	143
CLEC	16.67%	14.42%	12.63%	7.50%	7.76%	3.67%	8.74%	7.76%	11.70%	11.00%	3.13%	7.41%
Numerator	15	15	12	6	9	4	16	9	11	11	2	6
Volume	90	104	95	80	116	109	183	116	94	100	64	81
StDev												
StError	0.04326	0.03796	0.04073	0.03772	0.03385	0.03073	0.02972	0.05003	0.00000	0.00000	0.03042	0.02788
ZScore	-0.8114	-1.1988	-0.5082	0.0954	-0.0384	0.8395	-0.4475	2.1965			0.3715	-1.1519
Equity	YES	NO	NO	YES	YES							

B.2.19.6.1.1 10/28/2001

Unbundled Network Elements - Provisioning % Provisioning Troubles within 30 Days

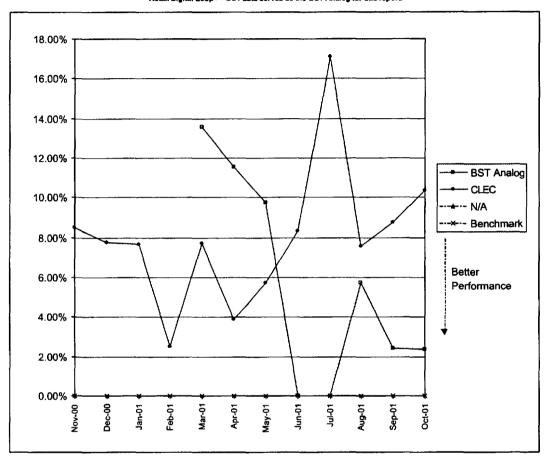
Digital Loop >= DS1/<10 circuits/Dispatch/GA (%)

(% of Trouble Reports Received within 30 Days of Service Order Completion)

Numerator indicates total number of initial trouble reports received within 30 days of service order completion for this disaggregation in the previous reporting period.

Volume indicates total number of service orders completed for this disaggregation in the previous reporting period.

Retail Digital Loop >= DS1 data serves as the BST Analog for this report.



		Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01
BST A	Analog					13.58%	11.54%	9.71%	0.00%	0.00%	5.71%	2.39%	2.38%
	Numerator					11	9	10	0	0	4	9	8
	Volume					81	78	103	45	35	70	376	336
CLEC		8.49%	7.74%	7.64%	2.51%	7.69%	3.86%	5.74%	8.32%	17.11%	7.55%	8.72%	10.34%
	Numerator	44	34	22	8	27	15	38	42	26	12	15	15
	Volume	518	439	288	319	351	389	662	505	152	159	172	145
StDev	,												
StEmo	У					0.04223	0.03964	0.03136	0.00000	0.00000	0.03329	0.01407	0.01515
ZSco	re					1.3948	1.9375	1.2658			-0.5505	-4.4970	-5.2573
Equity	, 1					YES	YES	YES	NO	NO	YES	NO	NO

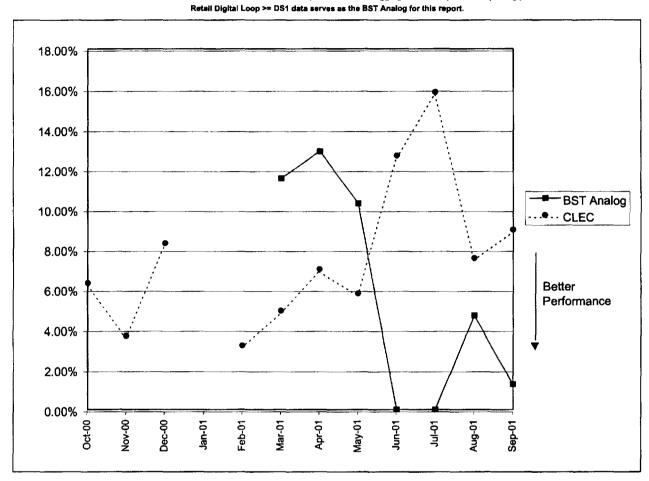
Unbundled Network Elements - Provisioning % Provisioning Troubles within 30 Days

Digital Loop >= DS1/<10 circuits/Dispatch/LA (%)

(% of Trouble Reports Received within 30 Days of Service Order Completion)

Numerator indicates total number of initial trouble reports received within 30 days of service order completion for this disaggregation in the previous reporting period.

Volume indicates total number of service orders completed for this disaggregation in the previous reporting period.



				4000									
		Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Арг-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01
BST Analog							11.54%	12.90%	10.29%	0.00%	0.00%	4.69%	1.27%
Nume	erator						9	8	7	0	0	3	2
Vo	lume						78	62	68	46	32	64	157
CLEC		6.31%	3.68%	8.30%		3.20%	4.92%	7.00%	5.79%	12.69%	15.84%	7.55%	8.97%
Nume	erator	19	13	20		8	13	25	19	42	16	12	_14
Voi	lume	301	353	241		250	264	357	328	331	101	159	156
StDev													
StError							0.04118	0.04612	0.04048	0.00000	0.00000	0.03129	0.01268
ZScore							1.6077	1.2793	1.1115			-0.9139	-6.0740
Equity							YES	YES	YES	NO	NO	YES	NO

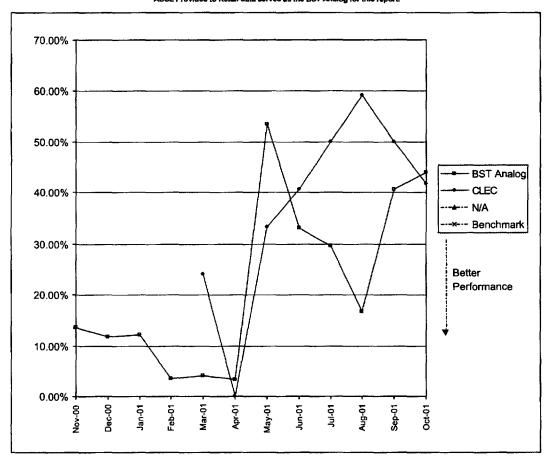
Unbundled Network Elements - Maintenance and Repair % Repeat Troubles within 30 Days Line Sharing/Non-Dispatch/GA (%)

(% of Troubles that Repeated within 30 Days)

Numerator indicates total number of troubles that repeated within 30 days in the reporting period.

Volume indicates total trouble reports for this disaggregation closed in the reporting period.

ADSL Provided to Retail data serves as the BST Analog for this report.



	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01
BST Analog	13.51%	11.76%	12.09%	3.48%	3.97%	3.31%	53.51%	33.13%	29.61%	16.67%	40.60%	43.96%
Numerator	114	101	136	33	55	41	99	53	69	28	1,035	1,463
Volume	844	859	1,125	947	1,387	1,237	185	160	233	168	2,549	3,328
CLEC					24.14%	0.00%	33.33%	40.63%	50.00%	59.09%	50.00%	41.67%
Numerator					7	0	3	13	25	13	6	5
Volume					29	12	9	32	50	22	12	12
StDev												
StError					0.03663	0.05189	0.17025	0.09114	0.07116	0.08450	0.14210	0.14354
ZScore					-5.5057	0.6378	1.1853	-0.8229	-2.8649	-5.0208	-0.6612	0.1598
Equity					NO	YES	YES	YES	NO	NO	YES	YES

Effective April 2001: Analog Changed from 'Tariffed ADSL' to 'ADSL Provided to Retail'

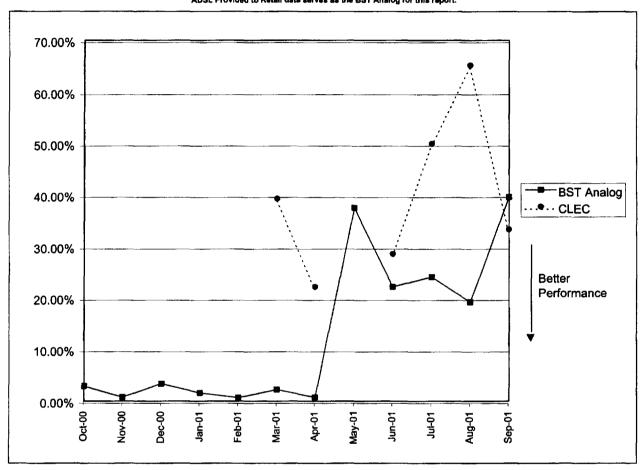
Unbundled Network Elements - Maintenance and Repair % Repeat Troubles within 30 Days Line Sharing/Non-Dispatch/LA (%)

(% of Troubles that Repeated within 30 Days)

Numerator indicates total number of troubles that repeated within 30 days in the reporting period.

Volume indicates total trouble reports for this disaggregation closed in the reporting period.

ADSL Provided to Retail data serves as the BST Analog for this report.



	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01
BST Analog	2.94%	0.76%	3.37%	1.59%	0.67%	2.23%	0.72%	37.50%	22.22%	24.14%	19.23%	39.63%
Numerator	4	3	14	8	2	10	3	21	14	28	15	363
Volume	136	394	415	504	297	448	419	56	63	116	78	916
CLEC						39.29%	22.22%		28.57%	50.00%	65.22%	33.33%
Numerator						11	2		2	6	15	4
Volume						28	9		7	12	23	12
StDev												
StError						0.02876	0.02848		0.16563	0.12976	0.09351	0.14212
ZScore						-12.8844	-7.5483		-0.3833	-1.9930	-4.9177	0.4430
Equity						NO	NO		YES	NO	NO	YES

Effective April 2001: Analog Changed from 'Tariffed ADSL' to 'ADSL Provided to Retail'

B.3.4.7.2 11/06/2001

REVISED DUF ELEMENTS 11-26-01

	· · · · · · · · · · · · · · · · · · ·	JPDATED FORECASTS GEORGIA)
L.0	ACCESS DAILY USAGE FILE (ADUF)	
L.1	ACCESS DAILY USAGE FILE (ADUF)	
L.1.1	ADUF, Message Processing, per message	\$0.001825
L.1.3	ADUF, Data Transmission (CONNECT:DIRECT), per message	\$0.00012147
M .0	DAILY USAGE FILES	
M.1	ENHANCED OPTIONAL DAILY USAGE FILE	
M.1.1	Enhanced Optional Daily usage File: Message Processing, Per Message	\$0.229779
M.2	OPTIONAL DAILY USAGE FILE	
M.2.1	Optional Daily Usage File: Recording, per Message	\$0.0000117
M.2.2	Optional Daily Usage File: Message Processing, Per Message	\$0.002446
M.2.3	Optional Daily Usage File: Message Processing, Per Magnetic Tape Provisioned	\$35.54
M.2.4	Optional Daily Usage File: Data Transmission (CONNECT:DIRECT), Per Message	\$0.00010122

LOUISIANA WITH

422256

LOUISIANA ORDERED GEORGIA PROPOSED

FILED 10-1-

01

\$0.007983 \$0.001849 \$0.00012681 \$0.00013189

\$0.250015 \$0.235679

\$0.0000117 \$0.0000088 \$0.004641 \$0.002496 \$48.45 \$35.76 \$0.00010568 \$0.00010991